

STATE OF SOUTH CAROLINA

BEFORE THE
PUBLIC SERVICE COMMISSION

In the matter of Petition for Approval of Nextel South
Corp.'s Adoption of the Interconnection Agreement
Between Sprint Communications Company L.P.,
Sprint Spectrum L.P. d/b/a Sprint PCS And
BellSouth Telecommunications, Inc. d/b/a AT&T
South Carolina d/b/a AT&T Southeast

COVER SHEET

DOCKET
NUMBER: 2007 - 255 - C

And

In the matter of Petition for Approval of NPCR, Inc.
d/b/a Nextel Partners' Adoption of the
Interconnection Agreement Between Sprint
Communications Company L.P., Sprint Spectrum
L.P. d/b/a Sprint PCS And BellSouth
Telecommunications, Inc. d/b/a AT&T South
Carolina d/b/a AT&T Southeast

DOCKET
NUMBER: 2007 - 256 - C

(Please type or print)

Submitted by: J. Jeffrey Pascoe

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☒ Other: Joint Motion for Continuance

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation

- | | | | |
|--|--|--|-----------------------------------|
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

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Spectrum L.P. d/b/a Sprint PCS And)
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AT&T South Carolina d/b/a AT&T)
Southeast)

Docket No. 2007-255-C

In the matter of:)
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Interconnection Agreement Between)
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Sprint Spectrum L.P. d/b/a Sprint PCS)
And BellSouth Telecommunications, Inc.)
d/b/a AT&T South Carolina d/b/a AT&T)
Southeast)

Docket No. 2007-256-C

JOINT MOTION FOR CONTINUANCE

COME NOW NPCR, Inc., d/b/a Nextel Partners and Nextel South Corp. ("Nextel") and BellSouth Telecommunications, Inc., d/b/a AT&T South Carolina ("AT&T") (collectively, "Joint Movants") and jointly move that the Commission continue the hearing in these consolidated proceedings to a date not earlier than sixty days from the currently scheduled hearing date of November 27, 2007. Specifically, Nextel and AT&T propose the date of January 31, 2008 for the rescheduled hearing in these proceedings. Joint Movants have consulted with the Office of Regulatory Staff ("ORS") and have confirmed that the ORS has no objection to this Joint Motion.

In support of their Motion, the Joint Movants respectfully show as follows:

1.

On October 9, 2007, the Commission issued its Order Granting Motion for Consolidation of Dockets in the above-referenced proceedings, in which the Commission ordered that the previously noticed procedural schedule for Nextel South Corp. in Docket No. 2007-255-C be utilized as the procedural schedule for the consolidated proceedings. This consolidated procedural schedule included a hearing date of November 27, 2007.

2.

On November 16, 2007, AT&T issued Accessible Letter CLECSE07-055 (“Accessible Letter”). The Accessible Letter states that “AT&T is modifying its position” regarding extension of the Sprint-AT&T interconnection agreement that Nextel seeks to adopt “to allow carriers additional opportunities to extend the terms of their agreements.” Joint Movants need additional time to confer regarding what impact AT&T’s modified position may have in these consolidated proceedings. Accordingly, the Joint Movants respectfully request that the Commission continue the November 27, 2007 hearing to a date not earlier than sixty days thereafter.¹ If the Commission agrees, Nextel and AT&T propose the date of January 31, 2008 for the rescheduled hearing in these proceedings. Joint Movants have consulted with the Office of Regulatory Staff (“ORS”) and have confirmed that the ORS has no objection to this Joint Motion.

¹ Counsel for Nextel is unavailable on January 29, 2008 because of hearings scheduled in another jurisdiction, and Counsel for ORS has requested protection between December 31, 2007 and January 4, 2008.

CONCLUSION

WHEREFORE, in recognition of the foregoing, the Joint Movants respectfully request that the Commission continue the hearing date in consolidated Docket Nos. 2007-255-C and 2007-256-C as requested herein.

Respectfully submitted this 20th day of November, 2007.

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Attorneys for Joint Movants

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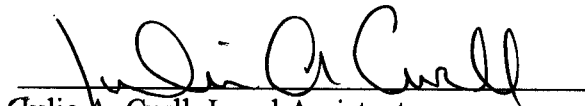
Docket No. 2007-256-C

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 20, 2007, she served a copy of the attached **Joint Motion For Continuance** by first-class mail, proper postage affixed addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es):

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